



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

RECEIVED

FEB 17 1994

RCAS SECTION

FEB 16 1994

All redactions in this document to remove non-responsive information

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky *John W. Bosky*
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Thomas F. Hogan
Chief, IRMS/PSBR/WSTM

This memorandum transmits the following RCRA joint compliance inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division. The inspection was a Level B MMI. The primary media was RCRA and the secondary media was Title III.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity No.</u>	<u>Potential Areas of Non-Compliance</u>
Hydrocarbon Recyclers, Inc. Wichita, KS	KSD007246846	ANF52	Training Incompatibles Containers Inspections Manifests

Attachments



R00001197
RCRA Records Center

REPORT OF JOINT RCRA OVERVIEW INSPECTION

AT

HYDROCARBON RECYCLERS, INCORPORATED

USPCI

2549 North New York
Wichita, Kansas 67219

EPA ID Number: KSD007246846

ON

February 8, 1994

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a joint RCRA overview inspection (JOI) was performed at USPCI - Hydrocarbon Recyclers, Inc. located in Wichita, KS, on February 8, 1994. This inspection was performed with KDHE as a means of evaluating the effectiveness, reliability and completeness of the state's inspection procedures in the administration and enforcement of their hazardous waste management program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the results of the inspection.

PARTICIPANTS

USPCI, Hydrocarbon Recyclers, Inc. (HRI):

Stephen Keiter, Facility Manager
Ronald Robertson, Facility Safety and Compliance Officer
Beth Justice, Lab Manager
Cary Mans, Production Manager

Kansas Department of Health and Environment (KDHE):

Gil Perez, Environmental Technician

U.S. Environmental Protection Agency (EPA):

Dedriel L. Newsome, Environmental Engineer

FACILITY DESCRIPTION

HRI collects hazardous waste from various generators. The waste is then either brokered, fuel blended or shipped off-site for incineration. The waste streams generated by HRI include

chlorinated solvents, tetrachloroethylene/debris, solvents/paints, oxidizers, corrosives, wastewater and others.

HRI submitted a revised Part A Hazardous Waste Permit Application on 12/20/93 as a treater and storer of hazardous waste. Their Part B is currently being reviewed.

INSPECTION FINDINGS AND CONCLUSIONS

1. The state inspector noted the following observations and apparent regulatory violations (More detail information on these violations may be obtained from the inspectors' report):


- a. Failure to separate incompatible drums of hazardous waste (acids and bases).
- b. Failure to properly label a drum of hazardous waste.
- c. Failure to conduct adequate annual refresher training.
- d. Failure to properly complete a manifest.

2. I noted the following observation and apparent regulatory violation:

1. I reviewed two facility inspection reports out of about 20 that did not note the date and nature of repairs that were conducted when a problem was observed. This is required by 265.15(d). The two inspection reports that noted problems for which no repair information was included were dated 11/23/93 and 8/23/93.

DISCUSSION OF INSPECTION

The following discussion and comments are provided as the basis for evaluating the performance of the state inspector during the inspection.



3. A Joint Oversight Inspection Checklist was completed during this inspect (see attachment 2):

Dedriel Newsome
Dedriel L. Newsome
Environmental Engineer
Date: 2/15/94
Activity No.: ANF52

John W. Bosky
John W. Bosky
Chief, RCRA Monitoring Section
Date: 2/15/94

Attachments

1. NOV
2. JOI Checklist (4 pages)



NOTICE OF COMPLIANCE/NON-COMPLIANCE

Page 1 of 1

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT Division of Environment Waste Management Program

Hazardous Waste: Complaint() LDF() TSF() GEN() KG() SQ() TRA() UOM() UOB() NOT A GEN()
Solid Waste: Complaint() SLF() TRF() ILF() CDL() HHW() OBS() UOS() WTT() WTP() WTM() YWC() MED()

TO: HYDRO CARBON RECYCLERS INC. 2 / 8 / 94
Facility Name Date

2549 NORTH NEW YORK WICHITA KS 67219
Address City State Zip Code

K S D 0 0 7 2 4 6 8 4 6

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

Citation	Description of Violation
<u>KAR 28-31-4(g)(1)</u>	<u>(pic) DMS Labeled Bases & Acids stored next to each other</u>
<u>KAR 28-31-4(b)</u>	<u>(pic) One Drum of Shredder KF labeled both hazardous & non-harm waste.</u>
<u>KAR 28-31-4(g)(4)</u>	<u>Annual refresher training does not adequately address all initial training topics as specified in Part 13 (Subpart K) and per 40 CFR 166. inspection should note date/nature of repairs.</u>
<u>KAR 28-31-4(k)</u>	<u>Manifest Document Number 03282 was changed to 03283 w/o being initialed & information placed in "Discrepancy" Area of Manifest.</u>
<u>KAR 28-31-4(d)</u>	
<u>40 CFR 262 appendix</u>	

☒ Other Comments/Concerns:

Need to determine when Waste Debris becomes "non hazardous" explain procedure
Many incoming Manifest display emergency resp. no. as a local number specifically Radium Petroleum - must be 24 hr avail.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to: must be 24 hr avail.

Kansas Department of Health and Environment
Bureau of District Operation
Waste Management Programs
1919 Amidon, Suite 130
Wichita, Kansas 67203-2118

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 838-1071 or Bureau of Waste Management in the Topeka Office at (913) 296-1604.

This Notice was prepared by

Gil Perez, BDO, Wichita

Date 2 / 8 / 94

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Stephen M. Keiter

Signature: Stephen M Keiter

Title: Facility Manager

Date: 2 / 8 / 94

